


Exhibit D

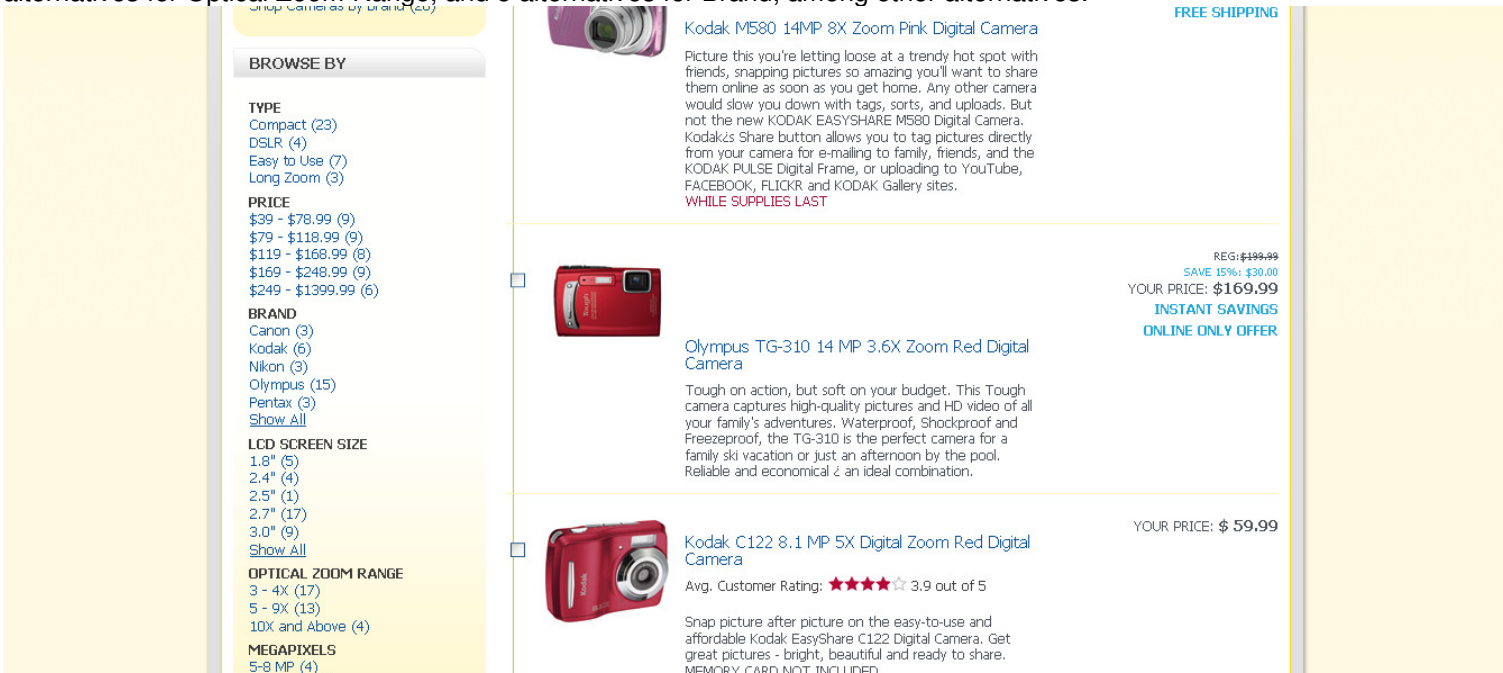
**To The Declaration of Benjamin Kleinman
In Support of Kelora Systems, LLC's
Opposition to Defendants' Claim
Construction Brief and Motion
For Summary Judgment of
Invalidity and Non-Infringement**

Appendix D to Kelora's Patent L.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions
Claim Chart Regarding Infringement of U.S. Patent 6,275,821 by OfficeMax

I. ACCUSED INSTRUMENTALITY: OFFICEMAX.COM

Claim	Accused Instrumentality
Claim 1	
<p>1. A method for assisting a user in identifying a subfamily of items within a family of items said method performed with a server connected to a client computer through a computer network, comprising the steps of:</p>	<p>OfficeMax performs a method for assisting a user in identifying a subfamily of items within a family of items, the method performed with a server connected to a client computer through a computer network.</p> <p>In particular, for example, OfficeMax servers that are connected to clients over the Internet at www.officemax.com perform the method. In the example screenshots below, the method is used for assisting users in identifying subfamilies of items within families of items, including Office Supplies, Paper, Technology, and Office Furniture, among others.</p> 
(a) providing a computer readable data file of stored information representing at least one family of items, said data file identifying at least one alternative for each item,	<p>OfficeMax provides via www.officemax.com a computer readable data file of stored information representing at least one family of items, the data file identifying at least one alternative for each item.</p> <p>As can be seen in the illustrative screenshots, one of the many families of items is Digital Cameras. See www.officemax.com/technology/digital-cameras-digital-video-cameras-digital-camera-accessories/digital-cameras, reachable from www.officemax.com by selecting Technology and then Digital Cameras.</p>
(b) reading said data file,	<p>OfficeMax reads the data file.</p> <p>For example, it does so in the process of serving the page listing Digital Cameras at www.officemax.com/technology/digital-cameras-digital-video-cameras-digital-camera-accessories/digital-cameras.</p>

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Claim Chart Regarding Infringement of U.S. Patent 6,275,821 by OfficeMax

Claim	Accused Instrumentality
(c) displaying a feature screen indicating said alternatives represented in the family,	<p>OfficeMax displays a feature screen indicating the alternatives represented in the family.</p> <p>As reflected in the below screenshot, OfficeMax displays a feature screen indicating alternatives represented in the family of Digital Cameras at www.officemax.com/technology/digital-cameras-digital-video-cameras-digital-camera-accessories/digital-cameras. Along the left side of the page is a column listing available alternatives, including 4 alternatives for Type, 3 alternatives for Optical Zoom Range, and 5 alternatives for Brand, among other alternatives.</p> 
(d) accepting a first selection criteria of at least one alternative,	<p>OfficeMax accepts a first selection criteria of at least one alternative.</p> <p>For example, a selection criteria corresponding to the "Canon" alternative under the heading "Brand" is accepted by OfficeMax at www.officemax.com. The selection criteria is used in step (e), below.</p>
(e) determining a first subfamily of items wherein each said item in the first subfamily satisfies said first selection criteria,	<p>OfficeMax determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria.</p> <p>For example, OfficeMax determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria corresponding to the "Canon" alternative.</p>
(f) determining available alternatives represented in the first subfamily,	<p>OfficeMax determines available alternatives represented in the first subfamily.</p> <p>For example, OfficeMax determines available alternatives in the first subfamily of "Digital Cameras" satisfying the first selection criteria corresponding to the "Canon" alternative. The results of the determination are used in step (g), below.</p>

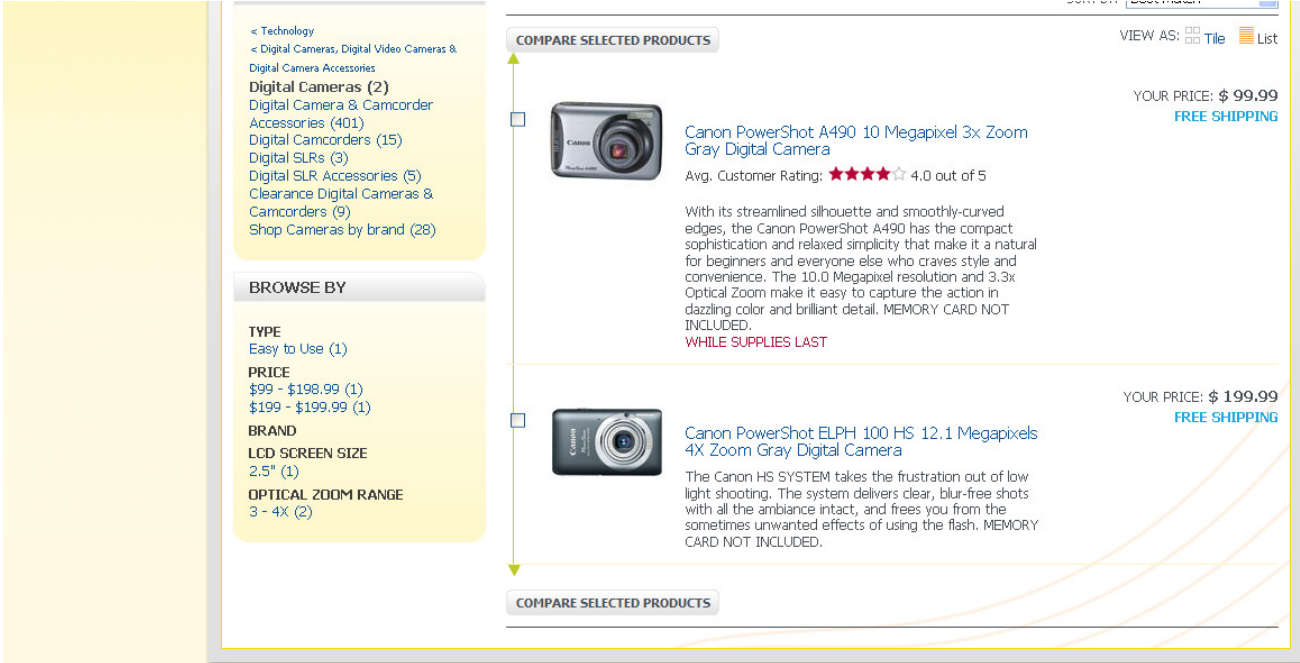
Appendix D to Kelora's Patent L.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions
 Claim Chart Regarding Infringement of U.S. Patent 6,275,821 by OfficeMax

Claim	Accused Instrumentality
(g) revising said feature screen to indicate the available alternatives of the first subfamily,	<p>OfficeMax revises the feature screen to indicate the available alternatives of the first subfamily.</p> <p>For example, OfficeMax revises the feature screen to indicate the available alternatives of the first subfamily of "Digital Cameras", as reflected in the below screenshot of www.officemax.com/technology/digital-cameras-digital-video-cameras-digital-camera-accessories/digital-cameras?refineName=Brand&refineValue=Canon&view=list&history=da6w3a3g categoryId~10004^categoryName~Technology^parentCategoryId~category_root^prodPage~25^region~1@adksuk7p categoryId~401^categoryName~digital-cameras-digital-video-cameras-digital-camera-accessories^parentCategoryId~cat_10004^prodPage~25^region~1^refine~1@eoe96pf7 prodPage~15^refine~1^region~1^categoryName~digital-cameras^categoryId~441^parentCategoryId~cat_401. The feature screen has been revised. For example, the available alternatives under Megapixels and Type have changed.</p>  <p>The screenshot shows the OfficeMax website's product listing for digital cameras. On the left, there is a sidebar with navigation links and filters. The main content area displays a list of cameras under the heading "COMPARE SELECTED PRODUCTS". The filters in the sidebar include:</p> <ul style="list-style-type: none"> Technology: Digital Cameras, Digital Video Cameras & Digital Camera Accessories Digital Cameras (3) Digital Camera & Camcorder Accessories (401) Digital Camcorders (15) Digital SLRs (3) Digital SLR Accessories (5) Clearance Digital Cameras & Camcorders (9) Shop Cameras by brand (28) <p>The "BROWSE BY" section shows the following filters:</p> <ul style="list-style-type: none"> TYPE: Easy to Use (1) PRICE: \$99 - \$178.99 (1), \$179 - \$198.99 (1), \$199 - \$199.99 (1) BRAND LCD SCREEN SIZE: 2.5" (1) OPTICAL ZOOM RANGE: 3 - 4X (2), 5 - 9X (1) MEGAPIXELS: 9-12 MP (2), 13-16 MP (1) <p>The main content area displays three camera models:</p> <ul style="list-style-type: none"> Canon PowerShot A490 10 Megapixel 3x Zoom Gray Digital Camera: YOUR PRICE: \$ 99.99, FREE SHIPPING. Avg. Customer Rating: 4.0 out of 5. Description: With its streamlined silhouette and smoothly-curved edges, the Canon PowerShot A490 has the compact sophistication and relaxed simplicity that make it a natural for beginners and everyone else who craves style and convenience. The 10.0 Megapixel resolution and 3.3x Optical Zoom make it easy to capture the action in dazzling color and brilliant detail. MEMORY CARD NOT INCLUDED. WHILE SUPPLIES LAST. Canon PowerShot ELPH 100 HS 12.1 Megapixels 4X Zoom Gray Digital Camera: YOUR PRICE: \$ 199.99, FREE SHIPPING. Description: The Canon HS SYSTEM takes the frustration out of low light shooting. The system delivers clear, blur-free shots with all the ambiance intact, and frees you from the sometimes unwanted effects of using the flash. MEMORY CARD NOT INCLUDED. Canon PowerShot A3300 IS 16 Megapixels 5X Zoom Red Digital Camera: YOUR PRICE: \$ 179.99, FREE SHIPPING.

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Claim	Accused Instrumentality
(h) accepting a second selection criteria from said client computer via said computer network at said server wherein the second selection criteria comprises a resubmission to the server of the alternative or alternatives of the first selection criteria plus at least one alternative selected from the revised feature screen,	<p>OfficeMax accepts a second selection criteria from the client computer via the computer network at the server wherein the second selection criteria comprises a resubmission to the server of the alternative or alternatives of the first selection criteria plus at least one alternative selected from the revised feature screen.</p> <p>For example, a second selection criteria corresponding to the "9-12 MP" alternative under the "Megapixels" heading and the "Canon" alternative of the first selection criteria is accepted by OfficeMax at www.officemax.com. This second selection criteria is used in step (i), below. This second selection criteria is reflected in the URL below, which includes a "Canon" segment (highlighted in yellow), plus a "9-12 MP" segment (highlighted in Green):</p> <p>www.officemax.com/technology/digital-cameras-digital-video-cameras-digital-camera-accessories/digital-cameras?refineName=Megapixels&refineValue=9-12+MP&view=list&history=da6w3a3g categoryId~10004^categoryName~Technology^parentCategoryId~category_root^prodPage~25^region~1@adksuk7p categoryId~401^categoryName~digital-cameras-digital-video-cameras-digital-camera-accessories^parentCategoryId~cat_10004^prodPage~25^region~1^refine~1@eoe96pf7 prodPage~15^refine~1^region~1^categoryName~digital-cameras^categoryId~441^parentCategoryId~cat_401@yj1huwcg refineName~Brand^prodPage~15^refine~1^sub_attr_name~1^region~1^refineValue~Canon.</p>
(i) determining a second subfamily of items of the family wherein each item in the second subfamily satisfies said second selection criteria,	<p>OfficeMax determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria.</p> <p>For example, OfficeMax determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria, corresponding to the "Canon" and "9-12 MP" alternatives.</p>
(j) determining available alternatives represented in the second subfamily, and	<p>OfficeMax determines available alternatives represented in the second subfamily.</p> <p>For example, OfficeMax determines available alternatives represented in the second subfamily satisfying the second selection criteria. The results of the determination are used in step (k), below.</p>


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Claim	Accused Instrumentality
(k) revising said feature screen to indicate the available alternatives of the second subfamily.	<p>OfficeMax revises the feature screen to indicate the available alternatives of the second subfamily.</p> <p>For example, OfficeMax revises the feature screen to indicate the available alternatives of the second subfamily, as reflected in the below screenshot of www.officemax.com/technology/digital-cameras-digital-video-cameras-digital-camera-accessories/digital-cameras?refineName=Megapixels&refineValue=9-12+MP&view=list&history=da6w3a3g categoryId~10004^categoryName~Technology^parentCategoryId~category_root^prodPage~25^region~1@adksuk7p categoryId~401^categoryName~digital-cameras-digital-video-cameras-digital-camera-accessories^parentCategoryId~cat_10004^prodPage~25^region~1^refine~1@eoe96pf7 prodPage~15^refine~1^region~1^categoryName~digital-cameras^categoryId~441^parentCategoryId~cat_401@yj1huwgc refineName~Brand^prodPage~15^refine~1^sub_attr_name~1^region~1^refineValue~Canon. The feature screen has been revised. For example, previously available alternatives for "Optical Zoom Range" are no longer available.</p>  <p>The screenshot shows the OfficeMax website interface. On the left, there is a navigation sidebar with links like '< Technology', '< Digital Cameras, Digital Video Cameras & Digital Camera Accessories', and 'Digital Cameras (2)'. Below these are 'BROWSE BY' filters for TYPE, PRICE, BRAND, LCD SCREEN SIZE, and OPTICAL ZOOM RANGE. The main content area is titled 'COMPARE SELECTED PRODUCTS' and displays two camera models. The first is the Canon PowerShot A490 10 Megapixel 3x Zoom Gray Digital Camera, priced at \$99.99 with free shipping. The second is the Canon PowerShot ELPH 100 HS 12.1 Megapixels 4X Zoom Gray Digital Camera, priced at \$199.99 with free shipping. Both cameras have a 4.0 out of 5 customer rating. The interface includes a 'VIEW AS' toggle for 'Tile' and 'List' views, and a 'COMPARE SELECTED PRODUCTS' button at the bottom.</p>


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Claim	Accused Instrumentality
Claim 2	
2. The method of claim 1 wherein each family has at least one feature associated therewith and further comprising the step of	<p>OfficeMax performs the method of claim 1 (see above) wherein each family has at least one feature associated therewith.</p> <p>For example, each of the families (and subfamilies) illustrated above includes a "Type" feature.</p>
displaying at least one grouping wherein each said grouping comprises one of said features visually related to respective alternatives.	<p>OfficeMax displays at least one grouping wherein each grouping comprises one of the features visually related to respective alternatives.</p> <p>For example, as shown in the screenshots above, OfficeMax displays a grouping including the "Type" feature visually related to the alternatives for that feature, such as "Easy to Use" and other alternatives.</p>

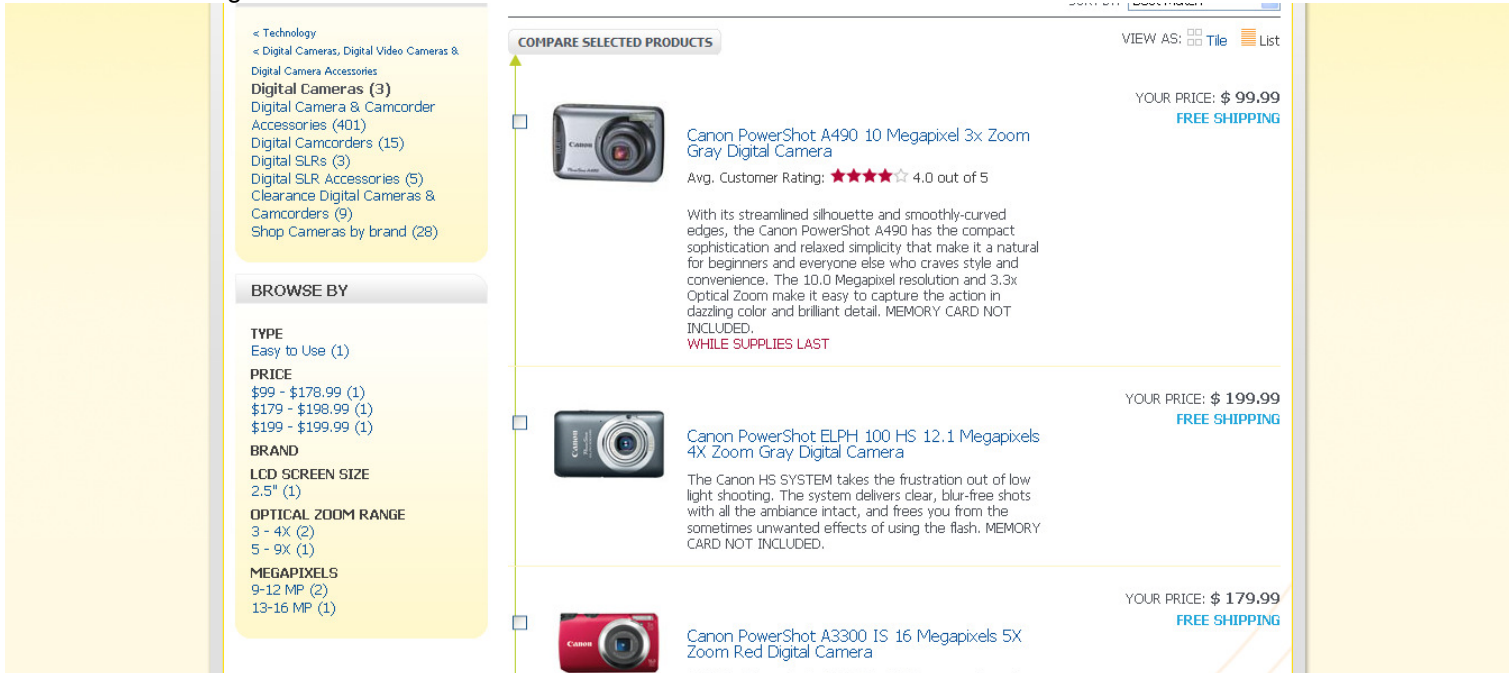
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Claim	Accused Instrumentality
Claim 9	
<p>9. A method for assisting a user in identifying a subfamily of items within a family of items, the method comprising the following steps which are performed with a server connected to a computer network:</p>	<p>OfficeMax performs a method for assisting a user in identifying a subfamily of items within a family of items, the method comprising the following steps which are performed with a server connected to a computer network.</p> <p>In particular, for example, OfficeMax servers that are accessible over the Internet at www.officemax.com perform this method. In the example screenshots below, the method is used for assisting users in identifying subfamilies of items within families of items, including Office Supplies, Paper, Technology, and Office Furniture, among others.</p> 
(a) providing a computer readable data file of stored information representing at least one family of items, said data file identifying at least one alternative for each item,	<p>OfficeMax provides via www.officemax.com a computer readable data file of stored information representing at least one family of items, the data file identifying at least one alternative for each item.</p> <p>As can be seen in the illustrative screenshots, one of the many families is Digital Cameras. See www.officemax.com/technology/digital-cameras-digital-video-cameras-digital-camera-accessories/digital-cameras, reachable from www.officemax.com by selecting Technology and then Digital Cameras.</p>
(b) reading said data file,	<p>OfficeMax reads the data file.</p> <p>For example, it does so in the process of serving the page listing Digital Cameras at www.officemax.com/technology/digital-cameras-digital-video-cameras-digital-camera-accessories/digital-cameras.</p>

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Claim	Accused Instrumentality
(c) displaying a feature screen indicating said alternatives represented in the family wherein data is output to a client computer via said computer network,	<p>OfficeMax displays a feature screen indicating the alternatives represented in the family wherein data is output to a client computer via the computer network.</p> <p>As reflected in the below screenshot, OfficeMax displays a feature screen indicating alternatives represented in the family of Digital Cameras at www.officemax.com/technology/digital-cameras-digital-video-cameras-digital-camera-accessories/digital-cameras. In so doing, it outputs, via the internet, to a client computer, data. Along the left side of the page is a column listing available alternatives, including 4 alternatives for Type, 3 alternatives for Optical Zoom Range, and 5 alternatives for Brand, among other alternatives.</p> 
(d) receiving and accepting a first selection criteria of at least one alternative from said client computer, said first selection criteria being received by said server from said client computer via said computer network,	<p>OfficeMax receives and accepts a first selection criteria of at least one alternative from the client computer, the first selection criteria being received by the server from the client computer via the computer network.</p> <p>For example, a first selection criteria corresponding to the “Canon” alternative under the heading “Brand” is received and accepted by OfficeMax at www.officemax.com. The selection criteria is used in step (e), below.</p>
(e) determining a first subfamily of items wherein each said item in the first subfamily satisfies said first selection criteria,	<p>OfficeMax determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria.</p> <p>For example, OfficeMax determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria corresponding to the “Canon” alternative.</p>

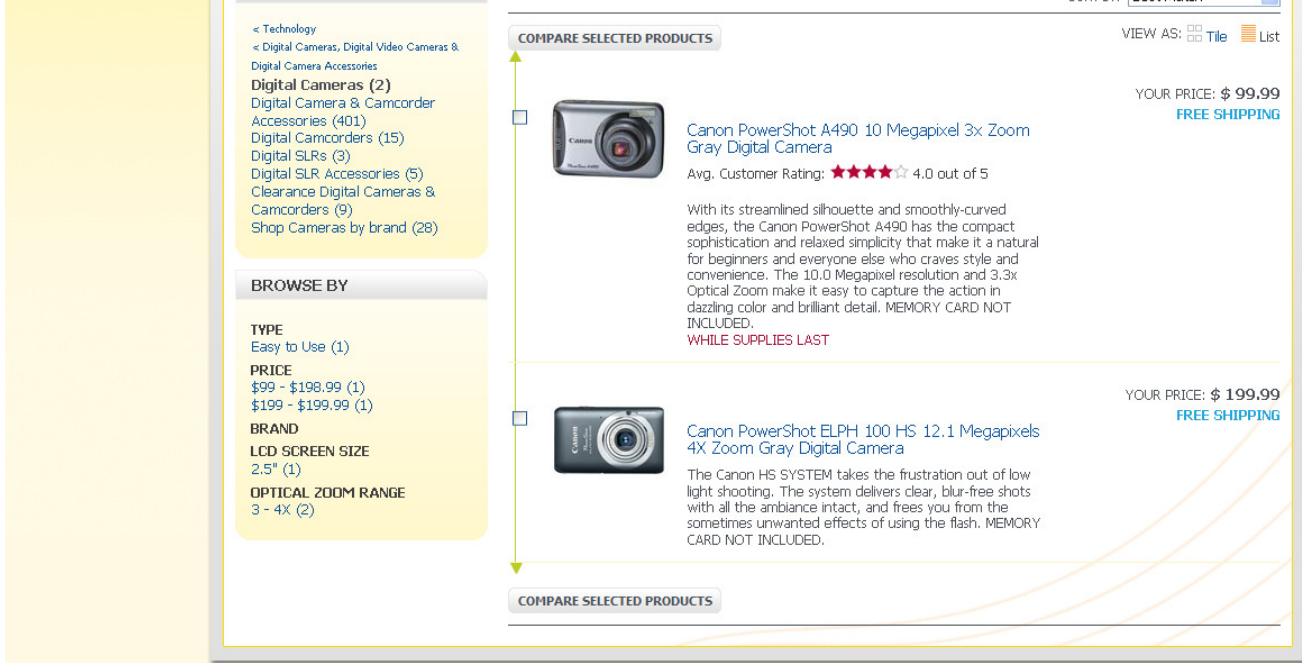
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Claim	Accused Instrumentality
(f) determining available alternatives represented in the first subfamily,	<p>OfficeMax determines available alternatives represented in the first subfamily.</p> <p>For example, OfficeMax determines available alternatives in the first subfamily of "Digital Cameras" satisfying the first selection criteria corresponding to the "Canon" alternative. The results of the determination are used in step (g), below.</p>
(g) revising said data for said feature screen to indicate the available alternatives of the first subfamily and outputting said revised data for said feature screen to said client computer via said computer network,	<p>OfficeMax revises the data for the feature screen to indicate the available alternatives of the first subfamily and outputs the revised data for the feature screen to the client computer via the computer network.</p> <p>For example, OfficeMax revises the data for the feature screen to indicate the available alternatives of the first subfamily of "Digital Cameras" and outputs that revised data to the client computer via the Internet, as reflected in the below screenshot of www.officemax.com/technology/digital-cameras-digital-video-cameras-digital-camera-accessories/digital-cameras?refineName=Brand&refineValue=Canon&view=list&history=da6w3a3g categoryId~10004^categoryName~Technology^parentCategoryId~category_root^prodPage~25^region~1@adksuk7p categoryId~401^categoryName~digital-cameras-digital-video-cameras-digital-camera-accessories^parentCategoryId~cat_10004^prodPage~25^region~1^refine~1@eoe96pf7 prodPage~15^refine~1^region~1^categoryName~digital-cameras^categoryId~441^parentCategoryId~cat_401. The data for the feature screen has been revised. For example, the available alternatives under Megapixels and Type have changed. Viewing the source of this screen also illustrates the changes.</p> 

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Claim	Accused Instrumentality
(h) receiving and accepting a second selection criteria from said client computer via said computer network, in which said second selection criteria comprises (1) a resubmission by said client computer of the alternative or alternatives of the first selection criteria along with (2) at least one alternative selected from the revised feature screen,	<p>OfficeMax receives and accepts a second selection criteria from the client computer via the computer network, in which the second selection criteria comprises (1) a resubmission by the client computer of the alternative or alternatives of the first selection criteria along with (2) at least one alternative selected from the revised feature screen.</p> <p>For example, a second selection criteria corresponding to the "9-12 MP" alternative under the "Megapixels" heading and the "Canon" alternative of the first selection criteria is received and accepted by OfficeMax at www.officemax.com. This second selection criteria is used in step (i), below. This second selection criteria is reflected in the URL below, which includes a "Canon" segment (highlighted in yellow), plus a "9-12 MP" segment (highlighted in Green):</p> <p>www.officemax.com/technology/digital-cameras-digital-video-cameras-digital-camera-accessories/digital-cameras?refineName=Megapixels&refineValue=9-12+MP&view=list&history=da6w3a3g categoryId~10004^categoryName~Technology^parentCategoryId~category_root^prodPage~25^region~1@adksuk7p categoryId~401^categoryName~digital-cameras-digital-video-cameras-digital-camera-accessories^parentCategoryId~cat_10004^prodPage~25^region~1^refine~1@eoe96pf7 prodPage~15^refine~1^region~1^categoryName~digital-cameras^categoryId~441^parentCategoryId~cat_401@yj1huwcg refineName~Brand^prodPage~15^refine~1^sub_attr_name~1^region~1^refineValue~Canon.</p>
(i) determining a second subfamily of items of the family wherein each item in the second subfamily satisfies said second selection criteria,	<p>OfficeMax determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria.</p> <p>For example, OfficeMax determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria, corresponding to the "Canon" and "9-12 MP" alternatives.</p>
(j) determining available alternatives represented in the second subfamily, and	<p>OfficeMax determines available alternatives represented in the second subfamily.</p> <p>For example, OfficeMax determines available alternatives represented in the second subfamily satisfying the second selection criteria. The results of the determination are used in step (k), below.</p>

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(k) revising said data for said feature screen to indicate the available alternatives of the second subfamily and outputting said revised data for said feature screen to said client computer via said computer network.	<p>OfficeMax revises the data for the feature screen to indicate the available alternatives of the second subfamily and outputs the revised data for the feature screen to the client computer via the computer network.</p> <p>For example, OfficeMax revises the data for the feature screen to indicate the available alternatives of the second subfamily, as reflected in the below screenshot of www.officemax.com/technology/digital-cameras-digital-video-cameras-digital-camera-accessories/digital-cameras?refineName=Megapixels&refineValue=9-12+MP&view=list&history=da6w3a3g categoryId~10004^categoryName~Technology^parentCategoryId~category_root^prodPage~25^region~1@adksuk7p categoryId~401^categoryName~digital-cameras-digital-video-cameras-digital-camera-accessories^parentCategoryId~cat_10004^prodPage~25^region~1^refine~1@eoe96pf7 prodPage~15^refine~1^region~1^categoryName~digital-cameras^categoryId~441^parentCategoryId~cat_401@yj1huwcg refineName~Brand^prodPage~15^refine~1^sub_attr_name~1^region~1^refineValue~Canon. The data has been revised. For example, previously available alternatives for "Optical Zoom Range" are no longer available. The data is output to the client computer via the Internet.</p> 

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